

From: [MILLER Margaret * DEQ](#)
To: [BARNACK Anthony * DEQ](#); [HEROUX Tori * DEQ](#)
Cc: [Vaupel, Claudia](#); [Kotchenruther, Robert](#)
Subject: RE: DEQ 2021 EE - MEETING RECAP
Date: Monday, March 07, 2022 11:14:11 AM

Thank you for attending today's DEQ 2021 EE meeting! Here is a quick recap from that meeting please disregard spelling or grammar errors. If you want anything else included please let me know.

Attendees:

Margaret Miller, ODEQ
Anthony Barnack, ODEQ
Tori Heroux, ODEQ
Bob Kotchenruther, EPA
Claudia Davis, EPA

Meeting Notes:

There is a CFR that if you're within 5% of standard you must start monitoring daily. A EE demonstration from 2017 triggered this within 5% thing and caused DEQ to have to monitor daily. DEQ was put there artificial because of wildfire smoke/EE.

DEQ couldn't afford to do daily FRM so we instead switched to daily FEM. ODEQ selected the T640, because we had experience with light scattering, but the T640 wasn't made for PNW. Basically, we choose the wrong FEM because the T640 is bias high by 60%. We corrected this in 2021 and in July we started using the BAM1022, but there is still bias from wintertime high values. (note: Jan-June T640 | June - on BAM1022)

Tori is working on the Klamath Falls maintenance/redetermination plan and needs to know the design value (Design value based on these years 2019, 2020, 2021) Tori's draft is due 3/31 and she needs to know what to do. She has a meeting with Christi on Friday.

The design value is different based on what monitor we select. FEM design value won't bring us down below standard, FRM will. DEQ needs to use the FRM because without that we don't have accurate daily values

Claudia asked if EPA could retract the concurrence of the 2017 EE demonstration (which triggered the daily monitoring requirement) and then DEQ wouldn't have to monitor daily. Could this be a solution. Anthony/Tori said NO, because DEQ would then need to be required to do 1-3 monitoring.. but we didn't have the FRM running on the 1-3 schedule because we switched it to 1-6 schedule. DEQ does have the NEPH co-located and we could use the NEPH data to verified the FRM.

Bob it sounds like we need to demonstrate to lawyers with the weight of evidence - using the non FRM data that supports that we're in compliance. Tori said we have a lot of evidence of compliance, but EPA has concerns about setting a precedent for this with other states.

Claudia asked if we don't reach an agreement and we have to wait until there is data that EPA is okay

with. Then how long would it push Klamath Falls back. Tori said until 2025 and there would be a lot of duplication of work including the emissions inventory and all the outreach. Plus we may need to demonstrate compliance with other soon to be changing standards. Also we agree that would be hard on the community Klamath Falls which has been burdened by all of this despite the fact that they're actually in attainment.

This is tough and hopefully we can find a way that DEQ can use the FRM data without putting EPA in a position that opens them up to similar requests from other states. We will need to connect again on all of this.

Action Items:

Set up a meeting with EPA & DEQ (Sarah needs to attend) about FEM vs. FRM,
Submit prenotification letter with details about EE demonstrations (at this point in time provide what details we know it's okay if it changes),
Claudia will connect with Sarah,
Tori might hear something on Friday. She will update Anthony and Margaret.